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**IN THE UNITED STATES OF DISTRICT COURT FOR THE
EASTERN DISTRICT OF CALIFORNIA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

Parker et al,

Defendant.

Case No.: 25-26 DJC

Stipulation and Order

DATE: 5/15/ 25

TIME: 9:00 AM

DEPT: Hon. Daniel J. Calabretta

IT IS HEREBY STIPULATED and agreed by and between Acting United States Attorney Michele Beckwith, through Assistant United States Attorney Emily Sauvageau, counsel for Plaintiff; John Parker, through counsel Tasha Chalfant; Veronica Brooks, through counsel Danica Mazenko; Xavier Surita, through counsel Olaf Hedberg; Federal Defender Heather Williams, through Assistant Federal Defender Christina Sinha, counsel for Raymundo Escobar; Marcelino Escobar, through counsel Clemente Jiménez; and Devon Nelson, through counsel Phil Cozens, that the status conference, currently set for May 15, 2025, **may be continued to August 28, 2025, at 9:00 a.m.**, with time between the dates excluded, as detailed below. The parties stipulate as follows:

1. A superseding indictment charging the above-listed defendants was filed on February 06, 2025. Dkt. 58.

2. The government has produced approximately 1,500 items of discovery (which are a mix of documents and media files) to below-signed defense counsel, as well as additional discovery pertinent to each of their individual clients.
3. Undersigned defense counsel represent that they require additional time to investigate this case, conduct legal research, consult with their clients, explore potential resolutions, and otherwise prepare for trial.
4. Undersigned defense counsel believe that failure to grant the requested continuance would deny them the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.
5. The government does not object to the continuance.
6. The parties stipulate that the ends of justice served by granting the requested continuance outweighs the best interest of the public and the above-listed defendants in a speedy trial, and respectfully request the Court so to find.
7. For the purpose of computing time under 18 U.S.C. § 3161 *et seq.* (the Speedy Trial Act), the parties request that the time period between May 15, 2025 and August 28, 2025 (inclusive) be deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(B)(iv) (Local Code T-4), because it would result from a continuance granted by the Court at the defense's request, based on a finding that the ends of justice served by granting the continuance outweighs the best interest of the public and the defendants in a speedy trial.

The parties therefore respectfully request this Court to adopt the parties' stipulation in its entirety as its Order.

Respectfully submitted,

Date: May 9, 2025

/s/ Tasha Chalfant

Attorney for Defendant

JOHN KEVIN PARKER

Date: May 9, 2025

/s/ Danica Mazenko

Attorney for Defendant

VERONICA BROOKS

Date: May 9, 2025

/s/ Olaf Hedberg

Attorney for Defendant

XAVIER SURITA

Date: May 9, 2025

/s/ Christina Sinha

CHRISTINA SINHA

Assistant Federal Defender

Attorneys for Defendant

RAYMUNDO ESCOBAR

Date: May 9, 2025

/s/ Clemente Jiménez

Attorney for Defendant

MARCELINO ESCOBAR

Date: May 9, 2025

/s/ Phil Cozens

Attorney for Defendant

DEVON NELSON

1
2 Date: *May 9, 2025*

MICHELE BECKWITH
Acting United States Attorney

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4 /s/ *Emily Sauvageau*
5 EMILY SAUVAGEAU
6 Assistant United States Attorney
7 Attorneys for Plaintiff
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14 **ORDER**

15 The Court, having received and considered the parties' stipulation, and good cause
16 appearing therefrom, adopts the parties' stipulation in its entirety as its order.
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18 IT IS SO ORDERED.
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20 Dated: May 9, 2025

21 /s/ Daniel J. Calabretta
22 THE HONORABLE DANIEL J. CALABRETTA
23 UNITED STATES DISTRICT JUDGE
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